



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

MAY 12 2004

Mr. Tom Sauta
Hydro-Test Products Inc.
P.O. Box 286
Stow, MA 01775

Ref. No. 04-0094

Dear Mr. Sauta:

This is in response to your letter and subsequent telephone conversation with a member of my staff asking whether the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) require the cylinder manufacturer's symbol to be included on the requalification record if the manufacturer's name is not known. You state that importing the symbol into your computer program poses a problem. You also ask that we provide a comprehensive list of cylinder manufacturers' symbols, including the old graphic symbols.

Section 180.215(b) states that either the symbol or the manufacturer's name must be included on the requalification records. Section 180.215(b) may be satisfied by entering a brief description of the symbol such as "B inside of triangle." In addition, if the manufacturer's name is not known for a particular symbol, you may contact the Research and Special Programs Administration (RSPA) Office of Hazardous Materials Exemptions and Approvals at 202/366-4512. Although there is no computerized list containing the old graphic symbols, the Approvals Office maintains certain information on the assignments.

I hope this information is helpful. Please contact this office should you have additional questions.

Sincerely,

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards



040094

180.215(b)(2)

McIntyre
§180.215 (b)(2)
Cylinders
November 14, 2003

04-0094

Mr. Edward T. Mazzullo
Director, Office of Hazardous Materials Standards
U.S. DOT/RSPA (DHM-10)
400 7th Street S.W.
Washington, D.C. 20590-0001

In regards to sec.180.215(b)(2). Is it acceptable to leave the entry for cylinder manufacturer blank if a symbol is present, but it is not known to whom that symbol is registered to?

For example a DOT specification cylinder with a cylinder manufacturers mark of a "B" inside a triangle. It is not known who that symbol is registered to, but it is present. Is the reququalifier required to draw the symbol on the test record form?

With the influx of automated test equipment, it is not practical to ask that the reququalifier be made to import symbols into the computerized program, if they cannot identify the symbol with a manufacturer.

If RSPA is going to enforce that the symbol must be on the test record form, if present, I would ask that RSPA make available a list of symbols for all manufacturers of cylinders, both current and those manufacturers that are no longer in business. If this listing is not available, what are your recommendations?

Thank you for your time,

Tom Sauta
Hydro-Test Products

Mr. Sauta

HAS NO
SPECIFIC
SYMBOL
REQUEST. THIS
WAS MADE UP
AS AN
EXAMPLE.
J.

HYDRO-TEST PRODUCTS INC.

85 HUDSON ROAD P.O. BOX 286
STOW, MA 01775

Tel # 800-225-9488

Fax # 978-897-1942

Email: tfsauta@hydro-test.com

Page 1